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5 *Attorney for Plaintiff*

6 **UNITED STATES DISTRICT COURT**  
7 **DISTRICT OF NEVADA**

8 **ALEJANDRO ONETO-ALONSO,**  
9 individually;

10 Plaintiff,

Case No.: 2:19-cv-0639-JAD-BNW

11 vs.

12 **FIRST PRIME MANAGEMENT INC., A**  
13 Nevada Corporation; **DANIEL MAZA-**  
14 **NORIEGA,** individually; **DOES 1-10;** and  
15 **ROES A-Z;**

16 Defendants.

17 **PLAINTIFF'S MOTION FOR ENLARGMENT OF TIME TO**  
18 **RESPOND TO THE COURT'S ORDER FILED SEPTEMBER 6, 2019**

19 **(FIRST REQUEST)**

20 Pursuant to Federal Rule of Civil Procedure ("FRCP") 6(b)(1), Plaintiff respectfully  
21 requests that the Court extend the time, to and until October 4, 2019, to file a response to the  
22 Court's September 6, 2019 Order directing the parties to file a discovery plan. Currently, the  
23 parties are expected to file a discovery plan today, September 27, 2019. This is Plaintiff's first  
24 request for an enlargement of time for the purpose identified herein.

25 Based upon the memorandum of points and authorities set forth below, Plaintiff  
26 respectfully requests that the Court grant this motion.  
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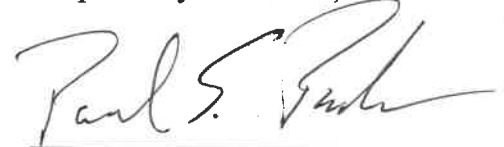
**MEMORANDUM OF POINTS AND AUTHORITIES**

Under FRCP 6(b)(1), this Court may extend the time for a party to comply with an act prior to its expiration based upon a showing of “good cause.” In this case, good cause exists to grant this motion.

The parties have been in communication regarding whether this case is subject to arbitration. Plaintiff’s counsel communicated with counsel for Daniel Maza-Noriega for the purpose of reaching an agreement upon an arbitrator. The parties are continuing that discussion. If the parties reach agreement regarding arbitration, they will file a stipulation on or before October 4, 2019 seeking to have the Court approve arbitration and they will jointly recommend disposition of further proceedings in this case. However, if the parties cannot reach an agreement, then Plaintiff anticipates filing a motion to compel based upon prior agreement of the parties to this lawsuit. In either instance, the Court will conserve judicial resources by potentially obviating the need for discovery.

Given the very short extension of time sought herein, and the potential for conserving significant resources in the long run, Plaintiff respectfully requests that the Court grant this motion.

Respectfully Submitted,



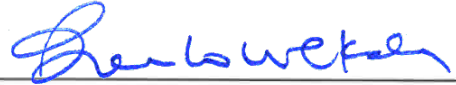
Paul S. Padda, Esq.

Counsel for Plaintiff

Dated: September 27, 2019

IT IS ORDERED:

Plaintiff having demonstrated "good cause," the motion seeking a one week extension to respond to the Court's September 6, 2019 Order is hereby granted. The parties shall respond to the Court's September 6, 2019 Order on or before October 4, 2019.



UNITED STATES MAGISTRATE JUDGE

DATED: October 3, 2019

CERTIFICATE OF SERVICE

In compliance with the Federal Rules of Civil Procedure and this Court's Local Rules of Civil Practice, the undersigned hereby certifies that on this day, September 27, 2019, a copy of the foregoing document was served upon all parties through the Court's CM/ECF system.



Paul S. Padda, Esq.